

Fill in this information to identify the case

Debtor 1 Anthony C Amodei

Debtor 2 _____
(Spouse, if filing)

United States Bankruptcy Court for the: EASTERN District of PENNSYLVANIA
(State)

Case number 19-17804

Form 4100R

Response to Notice of Final Cure Payment

10/15

According to Bankruptcy Rule 3002.1(g), the creditor responds to the trustee's notice of final cure payment.

Part 1: Mortgage Information

Name of creditor: PNC Bank, National Association

Court claim no. (if known):

Last 4 digits of any number you use to identify the debtor's account: 0505

5

Property address: 38 Winding Rd

Number Street

Levittown PA 19057

City

State

Zip Code

Part 2: Prepetition Default Payments

Check one:

☒ Creditor agrees that the debtor(s) have paid in full the amount required to cure the prepetition default on the creditor's claim.

☐ Creditor disagrees that the debtor(s) have paid in full the amount required to cure the prepetition default on the creditor's claim. Creditor asserts that the total prepetition amount remaining unpaid as of the date of this response is:

\$ _____

Part 3: Postpetition Mortgage Payment

Check one:

☐ Creditor states that the debtor(s) are current with all postpetition payments consistent with § 1322(b)(5) of the Bankruptcy Code, including all fees, charges, expenses, escrow, and costs.

The next postpetition payment from the debtor(s) is due on:

 / /
MM/DD/YYYY

☒ Creditor states that the debtor(s) are not current on all postpetition payments consistent with § 1322(b)(5) of the Bankruptcy Code, including all fees, charges, expenses, escrow, and costs.

Creditor asserts that the total amount remaining unpaid as of the date of this response is:

a. Total postpetition ongoing payments due:

(a) \$1,790.27

b. Total fees, charges, expenses, escrow, and costs outstanding: \$325.00 minus \$161.52 in suspense

(b) \$163.48

c. Total. Add lines a and b.

(c) \$1,953.75

Creditor asserts that the debtor(s) are contractually obligated for the postpetition payment(s) that first became due on:

01/01/2025
MM/DD/YYYY

Debtor 1 Anthony C Amodei Case number (if known) 19-17804
First Name Middle Name Last Name

Part 4: Itemized Payment History

If the creditor disagrees in Part 2 that the prepetition arrearage has been paid in full or states in Part 3 that the debtor(s) are not current with all postpetition payments, including all fees, charges, expenses, escrow, and costs, the creditor must attach an itemized payment history disclosing the following amounts from the date of the bankruptcy filing through the date of this response:

- ☐ all payments received;
- ☐ all fees, costs, escrow, and expenses assessed to the mortgage; and
- ☐ all amounts the creditor contends remain unpaid.

Part 5: Sign Here

The person completing this response must sign it. The response must be filed as a supplement to the creditor's proof of claim.

Check the appropriate box.

- ☐ I am the creditor.
- ☒ I am the creditor's authorized agent.

I declare under penalty of perjury that the information provided in this Notice is true and correct to the best of my knowledge, information, and reasonable belief.

X /s/Stephen R. Franks Date 01/10/2025
Signature

Print: Stephen R. Franks Title Attorneys for Creditor

Company MDK Legal

Address P.O. Box 165028
Number Street

Columbus, OH 43216-5028
City State ZIP Code

Contact phone 614-220-5611 Email amps@manleydeas.com

Exhibit B: Schedule of Amounts Outstanding Post-Petition Claim

Description		Dates incurred	Amount	
1.	Late charges	_____	(1)	\$ _____
2.	Non-sufficient funds (NSF) fees	_____	(2)	\$ _____
3.	Attorney's fees	_____	(3)	\$ _____
4.	Filing fees and court costs	_____	(4)	\$ _____
5.	Advertisement costs	_____	(5)	\$ _____
6.	Sheriff/auctioneer fees	_____	(6)	\$ _____
7.	Title costs	_____	(7)	\$ _____
8.	Recording fees	_____	(8)	\$ _____
9.	Appraisal/broker's price opinion fees	_____	(9)	\$ _____
10.	Property inspection fees	_____	(10)	\$ _____
11.	Tax advances (non-escrow)	_____	(11)	\$ _____
12.	Insurance advances (non-escrow)	_____	(12)	\$ _____
13.	Escrow shortage or deficiency (Do not include amounts that are part of any installment payment listed in Part 3.)	_____	(13)	\$ _____
14.	Property preservation expenses. Specify: _____	_____	(14)	\$ _____
15.	1 payment at \$1790.27	<u>1/1/25</u>	(15)	\$ <u>1,790.27</u>
16.	Other. Specify: POC Fees (PPFN 5/6/20)	<u>2/6/20</u>	(16)	\$ <u>325.00</u>
17.	Other. Suspense Balance	_____	(17)	\$ <u>-161.52</u>
Total postpetition fees, expenses, and charges. Add all of the amounts listed above.			(18)	\$ <u>1,953.75</u>

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

In re:	:	
	:	Case No.: 19-17804
Anthony C Amodei	:	Chapter 13
	:	Judge Ashely M. Chan
Debtor(s)	:	*****
	:	
PNC Bank, National Association	:	Related Document #
Movant,	:	
vs	:	
	:	
Anthony C Amodei	:	
Kenneth E. West	:	
Respondents.	:	

CERTIFICATE OF SERVICE

I certify that on the date of filing, a copy of the foregoing Response to Notice of Final Cure was filed electronically. Notice of this filing will be sent to the following parties through the Court's Electronic Case Filing System:

Office of U.S. Trustee, Party of Interest, (Registered address)@usdoj.gov

Kenneth E. West, Chapter 13 Trustee, ecfemails@ph13trustee.com

BRAD J. SADEK, Attorney for Anthony C Amodei, brad@sadeklaw.com

I certify that on the date of filing, a copy of the foregoing document was sent by U.S. Mail to the following:

Anthony C Amodei, 38 Winding Road, Levittown, PA 19057

/s/Stephen R. Franks